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# Program Memorandum Intermediaries/Carriers

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Department of Health and  
Human Services (DHHS)  
HEALTH CARE FINANCING  
ADMINISTRATION (HCFA)

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Transmittal AB-01-80

Date: MAY 15, 2001

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## CHANGE REQUEST 1625

**SUBJECT: Data Center Management Controls and Standard System Source Code**

It is HCFA's goal to have each standard system's code distributed as executable code. Starting with January 2001, the Common Working File (CWF) is sending out only executable computer code with listings that could assist data center personnel in pinpointing problems. Carrier standard systems have already migrated to this sort of a distribution system. We are not yet at the point where we can distribute only executable code for the intermediary standard systems, but rather we intend to establish management controls over Medicare production code, and to exert strict controls over local code that must be used to augment core standard system source code.

In all cases, beta test sites may have source code. Beta sites work only in a test mode, and they need the source code in order to work with the maintainers in troubleshooting and in designing fixes so that the code may be made production-ready.

This Program Memorandum (PM) outlines the controls that must be adhered to with respect to the management of production code at all locations, as well as the management of source code as long as it must be distributed.

### **I. Management Controls**

This portion of this PM applies to all carriers, intermediaries, and data centers:

HCFA expects each data center to adhere to its own management controls over Medicare production code. We will review required internal approvals and record keeping that each data center has established. HCFA will be visiting data centers to see the extent to which controls are adhered to, and whether the controls are adequate.

At a minimum, internal controls should follow the rules set forth in PM AB-00-75, A. Medicare Protocol Information Systems Objectives, dated August 11, 2000. The part of this PM that applies to production code controls requires contractors to ensure that:

1. Processing features and program modifications to Medicare standard systems are properly authorized. The individual who authorizes the modification must represent the interests of all groups who may be affected by the changes to the standard system. In general, the highest-level technical manager should personally authorize all changes.
2. New or newly revised standard system software is always tested and approved prior to production status. As specified in PM AB-01-07, Contractor Testing Requirements—Action, dated January 19, 2001, contractors are to develop and execute test cases designed to test any variations in the system local to that contractor, which may include criteria to ensure other processes and interactions function in accordance with specifications.
3. Standard system software libraries are controlled. Configuration management procedures must be defined that only allow approved (by software development manager or equivalent) tested changes to be entered into the library. An automated locking mechanism should be employed to ensure modules are released to one person at a time to avoid more than one person making changes to the same module at the same time.

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4. Access to standard system software is limited. While programmers need to be able to readily modify and test their code, the library must be protected against unauthorized changes. Only specifically approved (by the software development manager) programmers should have access to the library.
5. Access to, and the use of, standard system software is monitored. The status accounting procedure should show what was done, by whom, when, and the current status (source code being modified, module in test, ready for publication, etc.).
6. Standard system software changes are controlled. A configuration management process should exist that ensures all concerned parties consider all changes, and that each change is authorized before implementation. Also, the process should define under what conditions the change should be released.
7. In order to ensure that every change is approved, recorded, reviewed, tested, and tracked, each contractor is required to have and be able to identify documented policies and procedures for internal control standards. These policies and procedures should be updated to reflect any changes in operations, and be operating effectively within the contractor's organization.

## II. Local Code Management

This portion of this PM applies only to standard systems that issue source code to data center(s). For purposes of this PM, local code is defined as code not incorporated into the standard system as supplied by the standard system maintainer. Local code could be any locally made changes to maintainer supplied standard system code used in production claims processing.

In August of 1998, HCFA reminded all fiscal intermediary (FI) data centers that the rules for using Fiscal Intermediary Standard System (FISS) source code must be followed. This PM extends that requirement to all source code changes in the future. Such changes must be limited to immediate fixes such as an ABEND, changes to accommodate local print capability, changes to support a local coordination of benefits environment, interfaces with security packages, producing 1099s, and bank transactions.

It is not necessary to request approval for changes in utilities and tools run in conjunction with the Medicare standard system, but not as part of the standard system production code. Utilities not used in routine execution of the standard system application are not considered part of the standard system.

We are, by means of this PM, establishing a procedure for HCFA approval of changes to standard system source code. When requesting approval of a change, use the format shown in the Appendix of this PM.

In the case of an ABEND caused by standard system source code:

1. Make the proposed change so that processing can continue;
2. Within two business days, submit the change request to HCFA via e-mail. Send to: [changes@hcfa.gov](mailto:changes@hcfa.gov);
3. By the same date, submit the proposed change to the standard system maintainer. For example, for FISS, it would be a Telephone Assistance Request (TAR), or for APASS, a Customer Service Inquiry (CSI); and
4. We will determine whether/how the change will become part of the standard system.

For all other permitted changes to source code:

1. Submit the change request to us via e-mail. Send to [changes@hcfa.gov](mailto:changes@hcfa.gov);
2. Within two business days of receipt, we will approve or disapprove the change. If we approve, make the change and submit to the standard system maintainer; and
3. We will determine whether/how these changes should be incorporated into maintainer source code.

To start the process, we will send inventories of source code changes to the data centers. The data centers will check the inventories for accuracy and completeness, and update them as necessary. These inventories, combined with the newly established HCFA-approved change logs will constitute the work that must be accomplished by the appropriate standard systems. When there is room in future releases for these changes, we will direct maintainers to analyze the changes made to their source code, and work with their users to make the necessary changes to the standard system, thus eliminating local changes one by one.

#### **Attachment**

**The *effective date* for this PM is June 1, 2001.**

**The *implementation date* for this PM is June 1, 2001.**

**These instructions should be implemented within your current operating budget.**

**This PM may be discarded after June 1, 2002.**

**If you have any questions, contact Barbara Redding at 410-786-6151.**

**APPENDIX**

**SOURCE CODE CHANGE REQUEST**

Date:

Data Center: (Enter Data Center Name)

Carrier or Intermediary Name (Use this field if you are making a change for a specific carrier or intermediary):\_\_\_\_\_

Standard System (eg., APASS CSI or FISS TAR) Control No.\_\_\_\_\_

Date submitted:\_\_\_\_\_

Source Code Change Requested: (List programs to be changed)

Reason for Change: (Give detailed explanation why change is necessary)

Number of lines of code to be added or changed:

Brief description of how the local code will be tested:

Date Center Representative: (Signature)\*\_\_\_\_\_

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HCFA Approval: -----Yes -----No

HCFA Approval (Signature)\*\_\_\_\_\_Date:\_\_\_\_\_

Submit request to [changes@hcfa.gov](mailto:changes@hcfa.gov).

Standard system request status: \_\_\_\_\_

\*Typed signature acceptable.